

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

MERCHANTS BONDING COMPANY)	
(MUTUAL) and MERCHANTS NATIONAL)	
BONDING, INC.,)	
)	
Plaintiffs,)	Civil Action No. 2:24-CV-845
)	
JEFFREY J. PECK,)	
)	
Defendant.)	

DEFENDANT’S ASSENTED-TO MOTION
FOR 21-DAY EXTENSION TO FILE RESPONSIVE PLEADING

NOW COMES Defendant Jeffrey J. Peck, by and through undersigned counsel, and moves for a 21-day extension of time to file a responsive pleading in this matter, through and including September 30, 2024. Plaintiffs Merchants Bonding Company (Mutual) and Merchants National Bonding, Inc. (“Plaintiffs”) **assent** to this requested relief.

Having been served on or about August 19, 2024 (ECF 17), Defendant’s deadline to file a responsive pleading is presently September 9, 2024. Reserving all rights and without waiver of defenses, Defendant requests additional time to investigate the claims and defenses in this action and to prepare a responsive pleading. Defendant respectfully submits that a 21-day extension is supported by good cause, reasonable under the circumstances, and will not result in undue delay or undue prejudice. This is the first extension of time requested by any party in this action.

Undersigned counsel certifies that he has conferred in good faith with Plaintiffs’ counsel, Ashley P. Cullinan, Esq., and that Plaintiffs’ counsel agrees to an extension of time through September 30, 2024.

CONCLUSION

WHEREFORE, for the foregoing reasons, Defendant respectfully requests that this Assented-To Motion be granted that Defendant's deadline to file a responsive pleading be extended by 21 days, through and including September 30, 2024.

Dated at Burlington, Vermont this 29th day of August, 2024.

DOWNS RACHLIN MARTIN PLLC

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